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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his
guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado; C.S., a minor by
and through his guardian ad litem Elsa
Acosta, individually and as successor-
in-interest to William Salgado; J.S., a
minor by and through her guardian ad
litem Elsa Acosta, individually and as
successor-in-interest to William
Salgado; M.S., a minor by and through
her guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado,

**Case No. 2:23-cv-09412-CBM-AGR
(Consolidated with Case No. 2:24-cv-
04898-CBM-AGR)**

*District Judge Consuelo B. Marshall
Magistrate Judge Alicia G. Rosenberg*

**STIPULATION AND JOINT
REQUEST FOR ORDER
MODIFYING SCHEDULING
ORDER TO CONTINUE DEADLINE
TO CONDUCT SETTLEMENT
CONFERENCE ONLY**

*[Proposed Order filed concurrently
herewith]*

1 Plaintiffs,

2 v.

3 CITY OF HUNTINGTON PARK;
4 NICK NICHOLS; RENE REZA;
5 MATTHEW RINCON; APRIL
6 WHEELER; and DOES 5 through 10,
7 inclusive,

8 Defendants.

9 WILLIAM OMAR CASTILLO
10 MIRANDA, an individual and as
11 Successor in Interest for Decedent,
12 WILLIAM RENE SALGADO
13 MIRANDA; JUANA MARIA
14 MIRANDA, an individual and as
15 Successor in Interest for Decedent,
16 WILLIAM RENE SALGADO
17 MIRANDA; OSMAR ANTONIO
18 CASTILLO BLANDON, a minor by
19 and through Guardian ad litem,
20 EUGENIA GUADELUPE ESPINOZA
21 SALMERON; EUGENIA
22 GUADELUPE ESPINOZA
23 SALMERON, an individual; KARLA
24 VANESSA BLANDON, an individual,

25 Plaintiffs,

26 v.

27 CITY OF HUNTINGTON PARK;
28 RENE REZA, an individual; APRIL
 WHEELER, an individual; MATTHEW
 RINCON, an individual; NICK
 NICHOLS, an individual; JOSE A.
 YAMASAKI, an individual; SAUL
 RODRIGUEZ, an individual; and
 DOES 1 TO 10, inclusive,

 Defendants.

1 **TO THE HONORABLE COURT:**

2 IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs D.S., C.S.,
3 J.S., and M.S. (“*Salgado* Plaintiffs”); Plaintiffs William Omar Castillo Miranda,
4 Juana Maria Miranda, Osmar Antonio Castillo Blandon, Eugenia Guadalupe
5 Espinoza Salmeron, and Karla Vanessa Blandon (“*Miranda* Plaintiffs”); and
6 Defendants City of Huntington Park, Rene Reza, April Wheeler, Matthew Rincon,
7 Nick Nichols, Jose A. Yamasaki, and Saul Rodriguez (“Defendants”)—the parties to
8 this action—for the purpose of jointly requesting that the honorable Court enter an
9 order, pursuant to Fed. R. Civ. P. 16(b)(4) and any applicable Orders of the Court,
10 modifying the existing scheduling order in this case, as follows:

11 **GOOD CAUSE STATEMENT.**

- 12 1. WHEREAS, this is a wrongful death civil rights case involving the City of
13 Huntington Park Police Department. The *Salgado* Plaintiffs’ original
14 Complaint was filed against the City of Huntington Park and Doe defendants
15 on November 7, 2023. [Dkt. 1.] After that Complaint was filed, a First
16 Amended Complaint was filed on July 10, 2024, naming additional
17 defendants. [Dkt. 31-1.] All named defendants subsequently answered the
18 First Amended Complaint.
- 19 2. The Court issued an Order setting pretrial and trial dates and deadlines in the
20 *Salgado* action on April 30, 2024. [Dkt. 22.]
- 21 3. The *Miranda* Plaintiffs’ original Complaint was filed on June 11, 2024. [No.
22 2:24-cv-04898-CBM-AGR, Dkt. 1.] After that Complaint was filed, a First
23 Amended Complaint was filed on July 29, 2024, naming additional
24 defendants. [No. 2:24-cv-04898-CBM-AGR, Dkt. 12.] All named defendants
25 subsequently answered the First Amended Complaint.
- 26 4. The Court issued an Order consolidating the *Salgado* and *Miranda* cases for
27 purposes of discovery and trial on September 3, 2024, under the *Salgado*
28 docket, No. 2:23-cv-09412-CBM-AGR. [Dkt. 38.]

- 1 5. The Court issued an Order continuing certain pretrial deadlines governing the
2 consolidated cases on October 10, 2024. [Dkt. 41.] The new deadlines set by
3 the Court included a Deadline to Complete Settlement Conference of March
4 1, 2025, among others. [*Id.*] The Court also issued an Order continuing the
5 fact discovery cut-off by approximately one month on December 13, 2024,
6 without modifying any other scheduling order deadlines. [Dkt. 45.]
- 7 6. The parties have diligently pursued and completed fact discovery in this
8 consolidated case, and are nearing completion of expert discovery.
- 9 7. The parties have agreed to a mediation with panel mediator Richard
10 Copeland. [Dkt. 32, 33.] The parties contacted Mr. Copeland for his
11 availability months ahead of the March 1, 2025, mediation deadline set by the
12 Court. The parties learned that Mr. Copeland's only availability before that
13 deadline was February 7, a date when not all of the parties and their counsel
14 were available. The parties then reserved a date for mediation with Mr.
15 Copeland for April 3, 2024, which is the next earliest date the mediator had
16 available where the parties and their counsel were also available. This date
17 falls after the current mediation cutoff of March 1, 2025.
- 18 8. In order to complete a mediation before this case proceeds to a pretrial
19 conference and trial, and in accordance with the Court's order that the parties
20 engage in mediation in this case before the current trial date of May 27, 2025,
21 the parties are informed and believe that there is good cause for a continuance
22 of the deadline to complete mediation in this case
- 23 9. This is the second request by the parties for a continuance of the mediation
24 deadline in this matter, and the third request for a continuance more generally.

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STIPULATION RE CONTINUANCE OF SCHEDULING ORDER

DEADLINE.

10. Accordingly, in light of the foregoing Good Cause, the parties hereby stipulate and request a modification of the Court's scheduling order and case management deadline to complete mediation only, along the following lines:

EVENT	CURRENT DEADLINE	REQUESTED DEADLINE
Deadline to Complete Settlement Conference	03/01/2025	04/11/2025

11. The parties are not currently requesting a continuance of any other dates or deadlines set by the Court in this case and the parties understand that all other dates and deadlines shall remain unchanged and unaffected by the parties' stipulation and by the Order requested by the parties

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1 **IT IS SO STIPULATED.**

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3 DATED: February 10, 2025

LAW OFFICES OF DALE K. GALIPO

4
5 By: /s/ Benjamin S. Levine

6 Dale K. Galipo

7 Benjamin S. Levine¹

8 *Attorneys for Plaintiffs D.S., C.S.,
J.S., and M.S.*

9 DATED: February 10, 2025

CARRAZCO LAW, A.P.C.

10
11 By: /s/ Kent M. Henderson

12 Angel Carrazco, Jr.

13 Kent M. Henderson

14 Christopher L. Holm

15 *Attorneys for Plaintiffs William Omar*

16 *Castillo Miranda, Juana Maria*

17 *Miranda, Osmar Antonio Castillo*

18 *Blandon, Eugenia Guadalupe Espinoza*

19 *Salmeron, and Karla Vanessa Blandon*

20
21 DATED: February 10, 2025

ALVAREZ-GLASMAN & COLVIN

22 By: /s/ Roger A. Colvin

23 Roger A. Colvin

24 Christy M. Garcia

25 *Attorneys for Defendants*

26
27 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other
28 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
content and have authorized the filing.